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Via ECF

January 11, 2023

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, No. 03-MDL-1570 (GBD) (SN);
Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al., 04-cv-1076
(GBD)(SN); *Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)

Dear Judge Netburn:

We have enclosed twenty-three (23) consent orders granting substitution of attorney for a subset of plaintiffs represented by Kreindler & Kreindler LLP who have engaged undersigned counsel solely with respect to claims against the Taliban. These plaintiffs will remain clients of Kreindler & Kreindler LLP for all other claims.

The consent orders granting substitution of attorney concern the following plaintiffs:

1. Annalisa Genco, individually, as surviving child of Peter Genco (Exhibit A)
2. Diane Genco, individually, as surviving spouse of Peter Genco (Exhibit B)
3. Diane Genco, as the Personal Representative of the Estate of Peter Genco deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Peter Genco (Exhibit C)
4. Victoria Genco, individually, as surviving child of Peter Genco (Exhibit D)
5. Brian Leistman, individually, as surviving child of David Leistman (Exhibit E)
6. Donald Leistman, as the Personal Representative of the Estate of David Leistman, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of David Leistman (Exhibit F)
7. Katherine Leistman, individually, as surviving child of David Leistman (Exhibit G)
8. Maryclair Leistman, individually, as surviving spouse of David Leistman (Exhibit H)
9. Kimberly Trudel, as the Personal Representative of the Estate of Frederick Rimmele III, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Frederick Rimmele, III (Exhibit I)
10. Kimberly Trudel, individually, as surviving spouse of Frederick Rimmele, III (Exhibit J)
11. Donald Scauso, individually, as surviving child of Dennis Scauso (Exhibit K)

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12. Janlyn Scauso, individually, as surviving spouse of Dennis Scauso (Exhibit L)
13. Janlyn Scauso, as the Personal Representative of the Estate of Dennis Scauso, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Dennis Scauso (Exhibit M)
14. Juliette Scauso, individually, as surviving child of Dennis Scauso (Exhibit N)
15. Darcie Bailey-Scauso, individually, as surviving child of Dennis Scauso (Exhibit O)
16. Gabrielle Scauso, individually, as surviving child of Dennis Scauso (Exhibit P)
17. David Spampinato, individually, as surviving child of Donald Spampinato (Exhibit Q)
18. Donald Spampinato, individually, as surviving child of Donald Spampinato (Exhibit R)
19. Laurie Spampinato, individually, as surviving spouse of Donald Spampinato (Exhibit S)
20. Laurie Spampinato, as the Personal Representative of the Estate of Donald Spampinato, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Donald Spampinato (Exhibit T)
21. Peter Spampinato, individually, as surviving child of Donald Spampinato (Exhibit U)
22. Cella Woo-Yuen, individually, as surviving spouse of Elkin Yuen (Exhibit V)
23. Cella Woo-Yuen, as the Personal Representative of the Estate of Elkin Yuen, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Elkin Yuen (Exhibit W)

We request that this Court sign these consent orders granting substitution of attorney and direct the clerk to enter undersigned counsel's appearance as counsel of record for these plaintiffs solely with respect to claims against the Taliban.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry Goldman

Jerry S. Goldman, Esq.

Attorney for the Plaintiffs

Cc (via ECF): The Honorable George B. Daniels
All MDL Counsels of Record